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December 13, 2013

BY ECF FILING

The Honorable Denise Cote
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street, Room 1610
New York, NY 10007

The Honorable Andrew J. Peck
United States Magistrate Judge
United States District Court
Southern District of New York
500 Pearl Street, Courtroom 20D
New York, NY 10007

Re: *Seven Seas Partnership Ltd. v. Sycamore Pictures, LLC*, Case No. 1:13-cv-05054-DLC-AJP: Status

Dear Judges Cote and Peck:

We write pursuant to the Court's November 27, 2013 Order requesting an update on a potential settlement resolution of the above-captioned matter following the parties' November 13, 2013 settlement conference with Judge Peck.

Counsel for Seven Seas Partnership Limited ("Seven Seas") and Sycamore Pictures LLC ("Sycamore") have continued to work diligently to draft a settlement agreement reflecting the parameters discussed by the parties and identified by Judge Peck on November 13th. After counsel for Sycamore prepared and provided a first draft of an agreement on November 22, 2013, Seven Seas provided comments and revisions to Sycamore on December 2nd. Sycamore responded on December 10th with its comments and revisions, which included a demand that third party Donald Rosenfeld execute a mutual release in favor of Sycamore simultaneously with the parties' settlement agreement. This has necessitated Mr. Rosenfeld to secure independent

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counsel to advise in this regard. Seven Seas expects to provide its further response and comments to the draft agreement to Sycamore today. Counsel for the parties expect to meet and confer by telephone early next week to discuss any remaining open issues. We respectfully request that the parties be permitted to provide the Court a further update on the status of settlement by December 30, 2013.

The parties are happy to provide the Court with any further information should you find it helpful.

Respectfully,

s/Thomas P. Lane

Thomas P. Lane

cc: Maura Wogan, Esq.
Caren Decter, Esq.
Dan Webb, Esq.
Tim Rivelli, Esq.